

Nov 20, 2007
 [Signature]
 AUSA

SAO91 (Rev. 12/03) Criminal Complaint

UNITED STATES DISTRICT COURT

SOUTHERN

DISTRICT OF

OHIO

UNITED STATES OF AMERICA
 V.

CRIMINAL COMPLAINT

Case Number: 2:07-mj-484

Amanda Hines
 1199 E. Woodrow Ave., Columbus, OH 43207

(Name and Address of Defendant)

I, the undersigned complainant state that the following is true and correct to the best of my knowledge and belief. On or about 12/15/2003 in Franklin County, in the Southern District of Ohio defendant(s) did,

(Track Statutory Language of Offense)

make a material false and fraudulent statement in a matter within the jurisdiction of the United States Department of Housing and Urban Development,

in violation of Title 18 United States Code, Section(s) 1001.

I further state that I am a(n) Special Agent and that this complaint is based on the following facts:

Official Title

See Attached Affidavit

Continued on the attached sheet and made a part of this complaint: ☒ Yes ☐ No

Signature of Complainant

Printed Name of Complainant

Sworn to before me and signed in my presence,

Date

11/21/07

at

City

Columbus

State

OH

Name and Title of Judge

N M KING, U.S.M.

Signature of Judge

[Signature]

Nov. 20 2007
[Signature]
[Signature]

AFFIDAVIT

I, Jennifer Howell, being duly sworn, depose and state:

I am Special Agent with the U.S. Department of Housing and Urban Development, Office of Inspector General (HUD OIG), currently assigned to the Columbus, Ohio field office of the Midwest Division. I have been so employed by the HUD OIG for 8 years and have been assigned to investigations involving fraud and white-collar crime violations in the Southern District of Ohio for approximately 6 years.

This affidavit is made in support of a request for the issuance of a criminal complaint and arrest warrant for Amanda Hines. The facts set forth in this affidavit are offered to demonstrate that Amanda Hines committed the offense of theft of property or money of the United States, in violation 18 U.S.C. § 1001, by fraudulently converting to her own use U.S. Department of Housing and Urban Development low-income housing subsidy benefits in excess of what she actually qualified for based upon her household income.

I have investigated multiple cases in Chicago, Illinois and the Southern District of Ohio involving government subsidized housing tenant fraud. In 2005 the Department of Housing and Urban Development initiated an agency initiative involving Columbus Metropolitan Housing Authority (CMHA) tenants who allegedly failed to report employment and income when applying for and/or maintaining receipt of government benefits.

Columbus Metropolitan Housing Authority (CMHA) receives federal funds from the U.S. Department of Housing and Urban Development, a department of the United States, to administer the housing choice voucher program, often referred to as Section Eight. The housing choice voucher program is a program of the United States government for assisting very low-income families, elderly, and the disabled to afford decent, safe, and sanitary housing in the private market.

Under the provisions of the Section Eight program, CMHA pays a landlord a housing subsidy on behalf of a participating family. The family pays the difference between the actual rent charged by the landlord and the amount subsidized by the program. CMHA Section Eight tenants are required to re-certify eligibility for benefits annually or on an interim basis as required.

As part of the process of certification and/or recertification for housing subsidy benefits, CMHA Section Eight tenants are required to bring to an interview at CMHA verification of current (within the past 30 days) employment, income, and assets. All household members eighteen years and older review and sign a personal declaration form regarding employment, income, and assets. CMHA mails verification forms to third parties to confirm information provided by the tenant during the certification interview.

Amanda Hines began receiving CMHA Section Eight benefits on or about April 1995, and continued receiving such benefits through April 30, 2005.

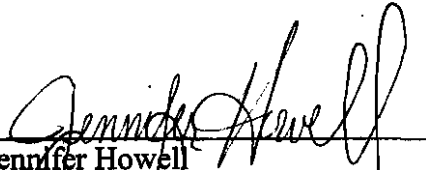
Hines became employed by Callander & Sons Inc effective January 20, 1999. Hines reported to CMHA that she did not have gainful employment at her December 14, 1999, December

11, 2000, December 27, 2001, December 17, 2002, and December 15, 2003 re-certification interviews for Section Eight benefits.

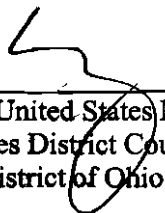
Pay statements and W-2's obtained from Callander & Sons Inc show Hines earned approximately \$86,954.21 from 2000 to 2004. Hines did not report any of the income when applying for and maintaining Section Eight housing benefits through CMHA.

Hines' failure to report true and accurate income during the period May 2000 through January 2005 resulted in an overpayment of Section Eight benefits in the approximate amount of \$22,626.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief


Jennifer Howell
Special Agent, U.S. Department of Housing and
Urban Development, Office of Inspector General

Sworn to and subscribed before me this 21st day of
November, 2007.



Honorable United States Magistrate Judge
United States District Court
Southern District of Ohio